

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEMETRIUS JOHNSON,

Plaintiff,

v.

REYNALDO GUEVARA, the ESTATE of  
ERNEST HALVERSON, DARRYL DALEY,  
WILLIAM ERICKSON, JOHN HEALY, and  
the CITY OF CHICAGO

Defendants.

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) Case No. 20 cv 4156  
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) Judge Sara L. Ellis  
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) Magistrate Judge Heather K. McShain  
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) JURY TRIAL DEMANDED

**DEFENDANTS HALVORSEN, DALEY, ERICKSON AND HEALY’S  
MOTION FOR SUMMARY JUDGMENT**

Defendants Halvorsen, Daley, Erickson and Healy by their attorneys, The Sotos Law Firm, P.C., and pursuant to Fed. R. Civ. P. 56 and L.R. 56.1, respectfully submit this motion for summary judgment and state:

1. This lawsuit arises from Plaintiff’s arrest, prosecution and conviction for the June 12, 1991 murder of Edwin Fred that took place in Chicago’s Humboldt Park neighborhood.

2. Plaintiff alleges that Defendants Halvorsen, Daley, Erickson and Healy (“Movants”) violated his fair trial rights by withholding and fabricating evidence, and used suggestive identification tactics to obtain identifications of Plaintiff and withheld evidence in violation of *Brady* evidence (Count I). Plaintiff further alleges Fourth Amendment unlawful pretrial detention claims and state law malicious prosecution claims (Counts II and VI), failure to intervene claims (Count III), federal and state civil conspiracy claims (Counts IV and IX) and state law claims of intentional infliction of emotional distress and willful and wanton conduct

(Counts VII and VIII).

3. After extensive discovery, Plaintiff has been unable to develop any credible evidence supporting his claims against Movants.

4. Accordingly, Defendants Daley and Healy seek summary judgment on all Plaintiff's claims based on their lack of involvement and knowledge of alleged violations of Plaintiff's rights.

5. Defendants Erickson and Halvorsen move for summary judgment on all Plaintiff's claims because the undisputed evidence reveals Plaintiff lacks sufficient evidence to support his claims.

6. In further support of this motion, Movants rely on their Memorandum of Law in Support of Summary Judgment and their Rule 56.1 Joint Statement of Undisputed Material Facts.

WHEREFORE, Movants respectfully request this Court enter an order granting them summary judgment and for such further relief as the Court deems appropriate.

Dated: April 12, 2024

Respectfully Submitted,

/s/ Josh M. Engquist

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**CERTIFICATE OF SERVICE**

I, Josh M. Engquist, certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that the foregoing is true and correct, that on Friday, April 12, 2024, I electronically filed the foregoing **Defendants Halvorsen, Daley, Erickson and Healy's Motion for Summary Judgment** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record on the below Service List.

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/s/ Josh M. Engquist  
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